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31 eBay Inc.

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33 UNITED STATES DISTRICT COURT  
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35 NORTHERN DISTRICT OF CALIFORNIA  
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37 SAN JOSE DIVISION

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39 UNITED STATES OF AMERICA,  
40 Plaintiff,  
41 v.  
42 EBAY INC.,  
43 Defendant.

44 CASE NO. CV12-05869-EJD-PSG

45  
46 **DECLARATION OF THOMAS P.**  
47 **BROWN IN SUPPORT OF STIPULATED**  
48 **REQUEST FOR RELIEF FROM STATUS**  
49 **CONFERENCE SCHEDULE**

1 I, Thomas P. Brown, declare as follows:

2       1. I am member in good standing of the Bar of the State of California and a partner  
 3 with the law firm of Paul Hastings LLP, counsel for the Defendant. I make this declaration of my  
 4 own personal knowledge and, if called as a witness, would testify to the matters set forth below.

5       2. This action was filed on November 16, 2012.

6       3. There is a Status Conference currently scheduled for May 16, 2014.

7       4. The parties respectfully request that the Court continue the Status Conference,  
 8 along with all other deadlines associated therewith, until August 29, 2014, or as soon thereafter as  
 9 the Court's calendar permits.

10       5. The parties in this matter and the related case, *The People of the State of*  
 11 *California v. eBay Inc.*, Case No. 12-cv-5874-EJD (PSG), have reached settlements and filed  
 12 their respective Settlement Agreements and Proposed Final Judgments on or about May 1, 2014.

13       6. The requested continuance is made for the purpose of allowing the requisite  
 14 reviews of the proposed settlements in this case and the related case.

15       7. There have been four previous time modifications to this case: a stipulated  
 16 enlargement of the briefing schedule on Defendant's motion to dismiss, Dkt. No. 19; the  
 17 continuation of a previously-scheduled Case Management Conference by order of the Court, Dkt.  
 18 No. 37; a stipulated stay of the case, Dkt. No. 51; and a previous stipulated request for relief from  
 19 the status conference schedule, Dkt. No. 55.

20       8. Counsel for the parties have also agreed to request that the Court stay all deadlines  
 21 associated with the November 12, 2013 Case Management Order, Dkt. No. 42. If the stay is  
 22 lifted, the parties agree to revisit the case schedule with the Court.

23       9. I am the ECF User whose ID and password are being used to file this Stipulation  
 24 and the corresponding [Proposed] Order. In compliance with Local Rule 5-1(i)(3), I hereby attest  
 25 that N. Scott Sacks has concurred in this filing.

26       I declare under penalty of perjury under the laws of the United States and the State of  
 27 California that the foregoing is true and correct.

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1 Executed on May 1, 2014 in San Francisco, California.  
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/s/ Thomas P. Brown  
Thomas P. Brown